



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

December 21, 2021

**BY ECF**


The Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

REQUEST GRANTED as to Jeremy Ortiz-Molina.

A Change of Plea hearing is scheduled for January 20, 2022 at 3:00PM in Courtroom 15C at the 500 Pearl Street Courthouse. The Court, with consent of all parties, excludes time from December 22, 2021 until January 20, 2022 pursuant to the Speedy Trial Act, 18 USC 3161(h)(7)(A), upon a finding that the interest of justice outweighs the interest of the public and the defendant in a speedy trial. 12/22/2021

Re: **United States v. Ortiz-Molina et al., 21 Cr. 173 (LJL)**

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

Dear Judge Liman:

The Government respectfully requests that a plea hearing be scheduled as to defendant Jeremy Ortiz-Molina. Because of his wife's upcoming surgery, the defendant requests a plea date of January 20, 2022, to which the Government does not object. The Government further writes to advise the Court that, upon the defendant's entry of a plea, the Government will take the position that remand is mandatory under 18 U.S.C. § 3143(a)(2) and, moreover, is justified by the danger to the community and risk of flight posed by the defendant. Defense counsel has represented that: (1) the defendant's wife is scheduled for outpatient surgery in the first week of January, (2) her recovery period will be six to eight weeks, and (3) during that time, the defendant will be needed to care for elderly members of the household. Based on those representations, the Government will not object if the defense requests, at the plea, that remand be delayed until approximately March 4, 2022, under 18 U.S.C. § 3145(c).

The Government further moves for the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h), between January 13 and January 20, 2022 because the purpose of scheduling the plea hearing in late January is to accommodate the defendant.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

by: /s/ Jun Xiang  
Jun Xiang  
Assistant United States Attorney  
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**CC (By ECF)** All Counsel of Record